LAW OFFICES OF PAUL J. VIRGO Paul J. Virgo, No. 67900 9909 Topanga Canyon Boulevard #282 Chatsworth, California 91311 Telephone: (310) 666-9701 FILED

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STATE BAR COURT CLERK'S OFFICE LOS ANGELES

Attorneys for Andrew James Stern

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THE STATE BAR COURT HEARING DEPARTMENT - LOS ANGELES

In the Matter of) Case Nos.: 15-0-10052;) 15-0-10055;) 16-0-10496.

ANDREW JAMES STERN, Respondent

No. 51648

RESPONDENT'S ANSWER TO NOTICE OF DISCIPLINARY CHARGES

A Member of the State Bar

) [Initial Status Conference: February 3, 2017 at 9:30 a.m.]

TO THE HONORABLE CYNTHIA VALENZUELA, JUDGE OF THE STATE
BAR COURT, AND TO SENIOR TRIAL COUNSEL, CHARLES CALIX, OFFICE OF
CHIEF TRIAL COUNSEL OF THE STATE BAR OF CALIFORNIA:

Pursuant to Rule 5.43 of the Rules of Procedure of the State Bar of California, Respondent Andrew James Stern, by and through his attorney(s) of record, hereby submits the following in response to the Notice of Disciplinary Charges (hereinafter "NDC") on file herein:

Under the provisions of the Rules of Procedure of the State Bar of California, Respondent Andrew James Stern hereby generally denies each and every allegation of the NDC and the whole thereof and further denies the Respondent has violated any

Rule of Professional Conduct in any manner whatsoever. In response to the specific allegations set forth in the NDC on file herein, Respondent Andrew James Stern asserts:

1. In response to Paragraph 1 of the NDC, Respondent admits said allegations for jurisdictional purposes only.

Case No. 15-0-10052

Count One

2. In response to Paragraph 2 of the NDC, Respondent denies said allegations.

Count Two

3. In response to Paragraph 3 of the NDC, Respondent denies said allegations.

Case No.15-0-10055

Count Three

4. In response to Paragraph 4 of the NDC, Respondent denies said allegations.

Count Four

5. In response to Paragraph 5 of the NDC, Respondent denies said allegations.

Count Five

6. In response to Paragraph 6 of the NDC, Respondent denies said allegations.

COUNT SIX

7. In response to Paragraph 7 of the NDC, Respondent denies said allegations.

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Case No. 10496

Count Seven

8. In response to Paragraph 8 of the NDC, Respondent denies said allegations.

Count Eight

9. In response to Paragraph 9 of the NDC, Respondent denies said allegations.

Dated: January 16, 2017

Respectfully submitted,

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LAW OFFICES OF PAUL J. VIRGO

By:

Pa/u/L J. Virgo

Attorneys for Respondent

Andrew James Stern

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DECLARATION OF SERVICE

Re: In the Matter of Andrew James Stern

Case Nos.: 15-O-10052-CV; 10055-CV; 16-O10496-CV

I, Paul J. Virgo, declare:

I am over the age of 18 years and not a party to the within action. My business address is 9909 Topanga Canyon Blvd., #282, Chatsworth, California 91311, in the County of Los Angeles.

RESPONDENT'S ANSWER TO NOTICE OF DISCIPLINARY CHARGES

was hand delivered to:

State Bar Court - Hearing Department State Bar of California 845 S. Figueroa Street Los Angeles, CA 90017-2515

Charles Calix, Senior Trial Counsel Office of the Chief Trial Counsel State Bar of California 845 S. Figueroa Street Los Angeles, CA 90017-2515

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and this declaration was executed at Chatsworth, California, on January 18, 2017

Paul J. Vin